

**Federal Defenders
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April 6, 2018

VIA ECF

Honorable Valerie E. Caproni
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: United States v. Robert Simmons, 08 Cr. 1280 (VEC)

Dear Judge Caproni:

I write on behalf of Robert Simmons, the defendant in this case, to request that the Court permit him to move permanently from Maryland to New York City, where he will live with his mother. If the Court grants this request, Mr. Simmons intends to move on April 25, 2018, and will be supervised here thereafter. He has notified Pretrial Services of his intended new address in New York City and has provided a telephone number where he can be reached. Neither the government nor Pretrial Services has any objection to this request.

Mr. Simmons was released from custody on August 29, 2016, and has been fully compliant with the conditions of his release.

I thank the Court for its time and attention to this matter.

Respectfully submitted,
/s/
Edward S. Zas
Assistant Federal Defender
212-417-8742

cc: AUSA Aimee Hector
USPTSO Lisa Chan (S.D.N.Y.)
USPTSO Natasha Ramesar (S.D.N.Y.)
USPTSO Scott Holtzer (D. Md.)